

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**HANGZHOU CHIC INTELLIGENT
TECHNOLOGY CO., LTD., and UNICORN
GLOBAL, INC.,**

Plaintiffs,

v.

**THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,**

Defendants.

)
)
) **Case No. 20-cv-4806**
)
) **Judge Thomas M. Durkin**
) **Magistrate Judge Jeffrey Cole**
)
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)
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)

DECLARATION OF ZHANG DIAN XUAN

I, Zhang Dianxuan, declare as follows:

1. I am the legal representative of Shenzhen Chetaidou Keji Youxian Gongsi, which sells products under Amazon Seller ID "Gyroor". I have personal knowledge of the facts stated herein and if called upon as a witness, I could and would competently testify to the below facts which are personally known to me.
2. Gyroor was restrained by Amazon because of this case on February 11, 2021.
3. Gyroor was released by Amazon on November 1, 2022.
4. I certify that the sales data and other documents provided to Stacy Kinsel for the damage calculation are true and correct.
5. I certify that Gyroor barely sold any hoverboard after its Amazon account was released by Amazon.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct based upon my personal knowledge.

Executed on January 23, 2024, in China.

Zhang Dianxuan

By: _____
Zhang Dianxuan